

In the matter of RM-11829

I strongly oppose the above petition to establish a new "TYRO" class of amateur license. In brief, the petitioner asks for the creation of an unnecessary license with non-standard and vague technical requirements to solve a non-existent problem.

1. The part of the spectrum the petitioner asks for is far from the vast wilderness he portrays, especially in the Northeast, Southern California and many of our larger metropolitan areas.
2. The main purpose of this petition seems to be an attempt to carve out virtually license-free spectrum from the Amateur Service and create a new service for the use of local C.E.R.T. teams which apparently do not fit into any one of the Part 95 services such as MURS, Citizens Band, FRS or GMRS.
3. The petition tries to conflate the ARRL's *Amateur Radio Emergency Corps* as some sort of communications auxiliary to C.E.R.T., which it certainly is not. Petitioner goes on to explain how this new license would "...allow ARES to solve CERT's communications problems." This is certainly not the role of ARES, although there are some amateurs who are participants in both programs.
4. The proposal is contrary to current amateur practice. It involves new methods and protocols not currently in amateur use, and speaks of radios which do not currently exist, but at the same time speaks to interoperability with amateur equipment.
5. It proposes strange unspecified "committees" to coordinate repeaters, but adds to the Commissions duties to adjudicate disputes. It allows these committees much more powers than the current repeater coordinators have.
6. The petitioner uses examples of ranchers, hunters, etc., but admits that those licensees would consider the license just another version of their telephone. There are non amateur Part 95 services more suited for that kind of use, especially when the users are businesses.
7. Petitioner claims that it is too difficult for anyone under the high school level to obtain an amateur license under the present structure. As an ARRL Registered Instructor and Volunteer Examiner, I find this claim absurd. I passed my license exam as a middle school student, when it required a code test and there was no study guide that included the actual exam questions and answers. I have taught classes where today's students of the same age can qualify for their license after ten weekly classes and some studying at home. What the petitioner is really saying is that there should be a license for people who don't really want to study for a test, they just want to talk on the radio. That is not what the Part 97.1 Basis and Purpose is about.

Once again, I strongly urge to Commission to reject this petition.

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